

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA,,

Plaintiff,

v.

FRANKLIN ROBERT HILL,

Defendant.

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CRIMINAL ACTION  
NO. 05-10111-RBC

**GLOBE NEWSPAPER COMPANY, INC.'S OPPOSITION TO  
DEFENDANT'S MOTION TO IMPOUND HIS SENTENCING  
MEMORANDUM**

Globe Newspaper Company, Inc. (the "Globe") respectfully moves to intervene in this proceeding for the limited purpose of opposing defendant Franklin Robert Hill's motion to impound his sentencing memorandum. As grounds for its motion, the Globe relies on its memorandum of law filed herewith. See also In re Boston Herald, Inc., 321 F.3d 174, 177 (1<sup>st</sup> Cir. 2003) (noting intervention of media in criminal case for purpose of pursuing access request); In re Globe Newspaper Co., 729 F.2d 47, 50 n.2 (1<sup>st</sup> Cir. 1984) ("Some courts have held that media representatives may challenge closure orders by appeal if they first intervene in the underlying action.").


WHEREFORE, Globe Newspaper Company, Inc. respectfully requests that its motion to intervene be allowed and that the Court deny the defendant's motion to impound his sentencing memorandum.

**OF COUNSEL:**

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**GLOBE NEWSPAPER COMPANY,  
INC.,**

By its attorneys,

  
/s/ Jonathan M. Albano  
Jonathan M. Albano, BBO#013850  
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Dated: September 20, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document  
was served upon the attorney of record for each other  
party by mail hand on September 20, 2005

